## EXHIBIT X

## Paul A. Woodard

From: Paul A. Woodard

**Sent:** Wednesday, November 16, 2016 7:56 PM

To: 'Kenneth Hiller'

**Cc:** 'Seth Andrews'; Terrence M. Connors

**Subject:** Wagner v. Chiari & Ilecki

Attachments: 2016.11.16 Defendant's First Set of Requests for Admission.pdf; 2016.11.16 Proposed Stipulation.pdf

Ken,

Further to our discussion last week, I enclose our requests for admission and a proposed stipulation. As discussed, if plaintiff admits each of the requests for admission and you agree to the terms of the stipulation, we will withdraw our notice of Seth Andrews' deposition.

Thank you for your attention to this matter. Of course, if you would like to discuss this matter further, please feel free to contact me.

Best regards,

Paul

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